



Dan Skopec  
Acting Secretary

# California Environmental Protection Agency

Air Resources Board • Department of Pesticide Regulation • Department of Toxic Substances Control  
Integrated Waste Management Board • Office of Environmental Health Hazard Assessment  
State Water Resources Control Board • Regional Water Quality Control Boards



Arnold Schwarzenegger  
Governor

Certified Mail: 7003 1680 0000 6174 7527

May 10, 2006

Mr. Jim Simpson, Director  
Stanislaus County Department of Environmental Resources  
3800 Cornucopia Way, Suite C  
Modesto, California 95358-9492

Dear Mr. Jim Simpson:

The California Environmental Protection Agency (Cal/EPA), Office of Emergency Services, and the Department of Toxic Substances Control conducted a program evaluation of Stanislaus County Department of Environmental Resources Certified Unified Program Agency (CUPA) on May 17-18, 2005. The evaluation consisted of a review of program elements, an in-office program review and a field inspection. Following the evaluation, the state evaluators completed an Evaluation Summary of Findings, which was reviewed with your agency's program management.

The evaluation summary of findings includes identified deficiencies, corrective action to be taken, and timeframes for correction of identified deficiencies. Two additional evaluation documents completed during the evaluation are the Program Observations and Recommendations and the Examples of Outstanding Program Implementation.

I have reviewed the enclosed copy of the Summary of Findings and the comments on the summary of findings that was submitted to Cal/EPA on July 26, 2005 and find that Stanislaus County Department of Environmental Resource's program meets standards.

Cal/EPA also noted during this evaluation that the Stanislaus County Department of Environmental Resources CUPA has worked to bring about a number of program innovations. One innovation is the identification of over 60 facilities in the county's Cal/ARP/RMP program. This is an unusually large number of facilities for any one CUPA to identify and manage. Stanislaus has done an exemplary job of both identifying the regulated community and following through with a very comprehensive program. Another example of outstanding program implementation is the identification of AST sites as part of the UST inspections, checking for Spill Prevention Control and Countermeasure Plan (SPCC) and educating the owner/operator on the federal Aboveground Petroleum Storage Tank Act. We will be sharing the outstanding program implementation examples and program innovations with the larger CUPA community through the Cal/EPA Unified Program web site to help foster a sharing of such ideas statewide.

Mr. Jim Simpson  
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Thank you for your continued commitment to the protection of public health and the environment through the implementation of your local Unified Program. If you have any questions or need further assistance, you may contact your evaluation team leader or Jim Bohon, Manager, Cal/EPA Unified Program at (916) 327-5097 or by email at [jbohon@calepa.ca.gov](mailto:jbohon@calepa.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Don Johnson", with a long horizontal flourish extending to the right.

Don Johnson  
Assistant Secretary  
California Environmental Protection Agency

Enclosures

cc: See next page

Mr. Jim Simpson  
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cc Mr. John Paine (Sent Via Email)  
California Environmental Protection Agency  
1001 I Street, 4<sup>th</sup> Floor  
Sacramento, CA 95814

Ms. Loretta Sylve (Sent Via Email)  
California Environmental Protection Agency  
1001 I Street, 4<sup>th</sup> Floor  
Sacramento, CA 95814

Mr. Mark Pear (Sent Via Email)  
Department of Toxic Substance Control  
700 Heinz Avenue, Suite 210  
Berkeley, California 94710-2721

Mr. Brian Abeel (Sent Via Email)  
Governor's Office of Emergency Services  
P.O. Box 419047  
Rancho Cordova, California 95741-9047

Mr. James Giannopoulos (Sent Via Email)  
State Water Resources Control Board  
P.O. Box 944212  
Sacramento, California 94244-2102

Mr. Charles McLaughlin (Sent Via Email)  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, CA 95812-0806

Ms. Vickie Sakamoto (Sent Via Email)  
Office of the State Fire Marshal  
P.O. Box 944246  
Sacramento, California 94244-2460

Mr. Moustafa Abou-Taleb (Sent Via Email)  
Governor's Office of Emergency Services  
P.O. Box 419047  
Rancho Cordova, California 95741-9047



Alan C. Lloyd, PhD  
Secretary for  
Environmental  
Protection

# STATE OF CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY



Arnold  
Schwarzenegger  
Governor

## **CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION SUMMARY OF FINDINGS**

**CUPA: Stanislaus County Department of Environmental Resources**  
**Evaluation Dates: May 17 & 18, 2005**

### **EVALUATION TEAM**

**CALEPA: Tina Gonzales**

**DTSC: Mark Pear**

**OES: Charles Snyder**

This Summary of Findings includes the deficiencies identified during the evaluation, observations and recommendations for program improvement, and examples of outstanding program implementation activities. The evaluation findings are preliminary and subject to change upon review by state agency and CUPA management. **Within 30-days from the evaluation date noted above, please complete and submit your response to each deficiency and recommendation identified in this Summary of Findings to the California Environmental Protection Agency.** Your response should identify the corrections made or actions to be taken and the date by which that correction will be completed for each deficiency. For each correction, please provide a copy of the revised document or other evidence of correction. Please submit these documents via e-mail, if maintained electronically, to Tina Gonzales at [tinag@calepa.ca.gov](mailto:tinag@calepa.ca.gov), or by mail to:

California Environmental Protection Agency  
Attn: Tina Gonzales  
Unified Program Section  
1001 I Street, 2<sup>nd</sup> Floor  
Sacramento, CA 95812

Questions or comments can be directed to Tina Gonzales at (916) 322-2155.

Certified Unified Program Agency (CUPA)  
Evaluation Summary of Findings

	<u>Deficiencies</u>	<u>Citation</u>	<u>Timeframe for Correction</u>
1	<p>The CUPA is not conducting inspections with a frequency that is consistent with its Inspection and Enforcement Plan and with the inspection of other program elements. The CUPA has not inspected all 1228 hazardous waste generators that have been identified by the CUPA. The last three annual inspection summary reports indicate the following:</p> <ul style="list-style-type: none"> <li>1) 453 hazardous waste generators were identified in Fiscal Year 01/02 of which 15 were inspected.</li> <li>2) 953 hazardous waste generators were identified in Fiscal Year 02/03 of which 15 were inspected.</li> <li>3) 1228 hazardous waste generators were identified in Fiscal Year 03/04 of which 186 were inspected.</li> <li>4) 254 facilities were inspected since June of 2004 based on the Generator Inspection List for dates 01/01/2002 to 04/20/2005.</li> </ul> <p>The CUPA has inspected approximately 38% of all known facilities generating hazardous waste over the past four fiscal years. In addition, there is a difference of approximately 259 facilities between what the CUPA has reported in its latest inspection summary report for Fiscal Year 2003-2004, which is 1228 facilities, and the total number of businesses manifesting off hazardous waste with active EPA ID numbers listed in the Department's Hazardous Waste Tracking System, which is 1487 facilities.</p> <p>Although improvement has been made since the last evaluation, further improvement can be made. After identifying any unlisted facilities, the CUPA shall complete inspections of all facilities including farms within its five inspection cycle.</p>		<p>1 year</p> <p>Additional resources have to be committed to the generator program</p>
2	<p>The CUPA did not conduct a complete oversight inspection. During the inspection, the inspector failed to require the operator to make a hazardous waste determination of a metallic dust from the turning of a brake drum on a lathe and failed to determine whether the generator was required to have secondary containment provided for the his waste oil and antifreeze tanks onsite.</p>		<p>Corrected</p> <p>Inspector appraised of the deficiencies</p>
3	<p>The CUPA failed, in this instance, <i>in the below cases</i> to take enforcement in a manner consistent with the law in that the CUPA failed to take the appropriate formal enforcement for the following violation concerning illegal disposal referred by the Public Works Department of Stanislaus County. Modesto Auto Wreckers was found to be draining oil on the east side of 520 Crows Landing Road. The inspector noted that the cars were being crushed next to the railroad by Forrest Silva</p>		<p>135 days</p> <p>The Cupa shall take formal enforcement</p>

**Certified Unified Program Agency (CUPA)  
Evaluation Summary of Findings**

	Crushing He also noted a tarp underneath the crusher to contain the waste oil running off from the vehicles, but there was still some soil staining covering an area approximately 10 feet by 20 feet. Mr. Silva stated to the inspector that contaminated soil would be picked up and placed in 55 gallon containers and stored at Modesto Auto Wreckers for disposal as hazardous waste. The inspector also spoke to Mr. Siler, owner of Modesto Auto Wreckers, regarding the car crushing next to the railroad property. He stated that he had permission from "Santa Fe Railroad"; however, the property is owned by Union Pacific Railroad. The inspector contacted Brian Chaves from Union Pacific regarding the car crushing activity occurring at his site. Mr. Chaves stated that Modesto Auto Wreckers does not have permission to crush vehicles on its property. While Stanislaus County halted present activity, it did not impose a penalty against Modesto Auto Wreckers and Forrest Silva Crushing for the illegal disposal of a hazardous waste under HSC 25189.5(a), but instead referred the case to Mr. Chavez of Union Pacific, the affected property owner.		
4	The CUPA is not inspecting all the businesses subject to the business plan program for compliance at least once every three years.		90 days Next Eval

**CUPA Representative**

\_\_\_\_\_  
(Print Name)      Original Signed  
(Signature)

**Evaluation Team Leader**

\_\_\_\_\_  
(Signature)      Original Signed  
(Telephone)

**Evaluation Team**

\_\_\_\_\_  
(OES)      Original Signed  
(SWRCB)

\_\_\_\_\_  
(OSFM)      Original Signed  
(DTSC)

Certified Unified Program Agency (CUPA)  
Evaluation Summary of Findings

**PROGRAM OBSERVATIONS AND RECOMMENDATIONS**

1. **Observations:** The CUPA is working on an on-line database to be used in-house by inspectors and other staff. The current focus is to show the most current inspections for UST and Disclosure (2185) by date of the last inspection. The staff person assigned is also working on other sections currently for the Tiered Permitting, Medical Waste, and Hazardous Waste Generator sections.

**Recommendations:** Continue working on this project as this will be a valuable asset to the Staff as to what inspections are due and the last inspection dates performed.

2. **Observations:** The CUPA is not documenting all training received to reflect in their personnel training documents.

**Recommendations:** Recommend that all training be documented by individual classes, total hours attended such as the CUPA conference, workshops, and training at CalEPA Headquarters. This will show the total hours in the various subject matters for required CUPA training completed by staff.

3. **Observations:** The CUPA's report 2 was not completed correctly for 2003/2004 fiscal year. Some of the fields were left blank; others had incorrect charges for reasons of overfilling or double billing and incorrect amounts entered, and database (Oracle issues). The Summary Report was very confusing to figure out looking at the totals billed, collected, and remitted to the State.

**Recommendations:** The CUPA should double check the amounts entered and have their accounting methods checked over and have the correct amounts entered from the CUPA, the collections agency (Treasurer). The accounting section of the CUPA should become more familiar with the correct amounts to enter in the Summary Reports and have the database set up with procedures to know what amounts to place in correct fields.

4. **Observations:** Although the CUPA's "Generator Inspection List" identifies VP Building located at 530 South Tegner in Turlock, CA as having a HW generator inspection conducted on 12/30/2003, and California Radiator located at 1651 Crows Landing in Modesto, CA as also having a HW generator inspection on 01/11/2005, only Hazardous Material Business Plan inspection reports could be found in their files. For Yosemite Community College located at 2201 Blue Gum in Modesto, CA for which a HW generator inspection was done on 11/13/2003, a generator inspection/enforcement data form was located in the files; however, no inspection report/checklist was found.

**Recommendation:** Hard copies of all inspection reports/checklists as well as the inspector's observations should be maintained in the files.

Certified Unified Program Agency (CUPA)  
Evaluation Summary of Findings

5. **Observation:** No inspection report/checklist for the complaint received on March 8, 2005 at Lopez Auto Repair located at 1328 Ninth Street could be found in the files, nor does the complaint tracking form indicate any action as having been taken to date.

**Recommendation:** Please update computer tracking database as to status of the complaint.

6. **Observation:** The Business Plan Program needs little more effort to meet all the requirements.

**Recommendations:** Stanislaus needs to put more effort into ensuring that the inspections frequencies are being met.



Certified Unified Program Agency (CUPA)  
Evaluation Summary of Findings

**EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION**

1. The Stanislaus County Website has the Department of Environmental Resources information on the Environmental Health and Hazardous Materials Programs which are useful sources for AST, UST, Household Hazardous Waste Collection, and Business Plan Programs, containing Program Manager information, phone numbers, forms, and contact numbers for any problems encountered with the forms found on the website.
2. The CUPA's last Summary Reports have been turned in on time as requested to CalEPA.
3. The CUPA's 2004 UST Inspection rates have been outstanding with nearly 100% of facilities being inspected. AST sites are identified as part of the inspection process, checking for SPCC and education of the owner/operator on the Aboveground Petroleum Storage Tank Act.
4. The CUPA has a through UST Permitting and renewal process using an in-house data tracking system, file review, and request for updated information as needed with inspections. Reports are generated by the last inspection date which inspectors use to determine the next inspection date.
5. The CUPA is an active participant in the Northern Central Valley Regional Environmental Task Force Quarterly meetings with the Federal, State, and Local agencies.
6. The CUPA has generalist inspectors which do all inspections for the whole district including the yearly inspections for the Medical Waste and UST sites.
7. The CUPA has extensive Public Information Counter forms covering various programs, applications, checklists, inspection sheets, and also publishes a yearly newsletter for UST and Hazardous Waste. Copies of both a short form and a long form consolidated permit application packets are made available at the office for businesses.
8. The CUPA has good Recordkeeping procedures for their back room program files. The files are coded by business type, filed by street address alphabetically, and files are color coded by program type with a copy of a code sheet posted for identification.
9. The CUPA is working on an on-line Database for businesses to use and does have someone assigned to working on this project, which may be out for use sometime next month for testing.
10. Complaint and Stipulated Judgment in People v. Jeffrey Rydberg d.b.a. Jeff Rydberg Trucking was settled with \$400 payable to Stanislaus County Dept. of Environmental Resources as a cost recovery for the July 22, 2003 spill.
11. Complaint and Stipulated Judgment in People v. David Martins et al was settled with \$2,000 payable to Stanislaus County.

**Certified Unified Program Agency (CUPA)  
Evaluation Summary of Findings**

- 12. The Department has requested the assistance of the Circuit Prosecutor in filing criminal or civil actions against the owners and/or operators of Eagle Gas for failure to comply with the California Health & Safety Code, Division 20, Chapter 6.7 (Underground Storage of Hazardous Substances) and the California Code of Regulations, Title 23, Division 3, Chapter (Underground Tank Regulations).**
- 13. Stanislaus County collected \$2,604 for payment of costs incurred for a waste cleanup concerning Mr. Larry Melton's property.**
- 14. Stanislaus' CalARP/RMP program has identified over 60 facilities. This is a very unusually large number of facilities for any one CUPA to identify and manage. Stanislaus has done an exemplary job of both identifying the regulated community and following through with a very comprehensive program.**
- 15. The business plan files are well maintained and organized.**
- 16. Very informative and comprehensive public information and outreach documents.**



**DEPARTMENT OF ENVIRONMENTAL RESOURCES**

3800 Cornucopia Way, Suite C Modesto, CA 95358-9492  
Phone: 209.525.6700 Fax: 209.525.6774

July 26, 2005

Tina Gonzales  
California Environmental Protection Agency  
Unified Program Section  
1001 I Street, 2<sup>nd</sup> Floor  
Sacramento, California 95812

**SUBJECT: Comments on the 2005 CUPA Evaluation Summary of Findings**

Dear Ms. Gonzales:

The following comments are regarding the above-mentioned document:

**2005 CUPA EVALUATION SUMMARY OF FINDINGS**

- 1. Deficiency:** The CUPA is not conducting inspections (hazardous waste generators) with a frequency that is consistent with its Inspection and Enforcement Plan and with the inspection of other program elements. The CUPA has not inspected all 1228 hazardous waste generators that have been identified by the CUPA.

**Required Action:** The CUPA shall complete inspections of all facilities, including farms with a five-year inspection cycle.

**DER Response:** The Department agrees that not all generators of hazardous waste have been inspected and that we are behind schedule. The required action states that we shall complete inspections for all facilities including farms within a five-year cycle. As I presented to the evaluation team, we recognized we were behind in our inspections and have already made adjustments. My CUPA district staff have focused their attention on the generator inspections over the past fiscal year. My records show that 267 generator inspections were completed including larger farms during the 2004/2005 fiscal year (see attached). A review of our Inspection and Enforcement Plan presented to the Evaluation team only shows 1156 hazardous waste generators, not 1228 within Stanislaus County. By dividing 1156 facilities by five, we would need to complete 231 inspections per year to accomplish our goal.

The inspections for the smaller farms will be included as staff and time permit us to do so. A survey of the surrounding valley counties has shown this to be the case for all. We believe we have made the necessary corrections in addressing this deficiency. We will continue to monitor our CUPA inspections to assure we stay on task.

2. **Deficiency:** The CUPA has not conducted a complete oversight inspection. During the inspection, the inspector failed to require the operator to make a hazardous waste determination of a metallic dust from the turning of a brake drum on a lathe, and failed to determine whether the generator was required to have secondary containment provided for his waste oil and antifreeze tanks onsite.

**Required Action:** The inspector was apprised of the deficiency and the deficiency was corrected.

**DER Response:** The deficiency was corrected so no further action is required. The Department will continue to provide generator training to the CUPA staff to help develop and improve their generator program knowledge and inspection skills

3. **Deficiency:** The CUPA failed, in this instance, to take enforcement in a manner consistent with the law in that the CUPA failed to take appropriate formal enforcement action. From a complaint, the inspector noted an auto wrecker was crushing cars on railroad property. The wrecking company had a tarp underneath the crusher to contain the oil runoff, but there still was some soil staining. The inspector halted the crushing activity but did not impose a penalty against the wrecking company; instead, they referred the case to the railroad company.

**Required Action:** The CUPA shall take formal enforcement.

**DER Response:** The Department has reviewed the complaint and I have spoken with the district inspector. The auto wrecker under the direction and supervision of the Department removed the small amount of oil that ran off the tarp onto the soil. The soil, which only amounted to little over half a drum, was contained and moved to the property of the auto wrecker for proper disposal. There was a mobile home owned by the auto wrecker on the railroad property, which we referred to Code Enforcement and to the railroad company. The contaminated soil case was not referred to the railroad company. We did not and still do not feel that this case warrants any formal enforcement action due to the amount of oil moved off the tarp placed under the crushing operation. In addition, the auto wrecker would have to pay for the disposal of the contaminated soil. The Department does take formal enforcement action when necessary as illustrated with the data provided to the evaluation team during their visit. The Department feels we are in compliance and disagree with this deficiency.

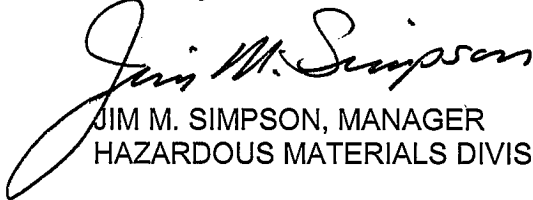
4. **Deficiency:** The CUPA is not inspecting all the businesses subject to the business plan program for compliance at least once every three years.

**Required Action:** The CUPA is to inspect all businesses subject to the business plan every three years.

**DER Response:** The Department agrees that we are behind in our business plan inspection, but mainly in our farm inspection program. My records show that we have 1969 active businesses (excluding farms) in our database (see attached). If you divided that number by three, it will equal to 656 inspections per year to meet our goal. Last fiscal year, my CUPA district staff conducted 710 business plan inspections (see attached). We currently have 589 farms in our business plan program. Of these, we inspected 105 over the past fiscal year. We will need to conduct 196 farm inspections per year to meet our goal. Additional time for farm business plan inspections will be required by the CUPA district staff to increase the number of farm business plan inspections. We will monitor our CUPA staff inspections to assure the numbers of farm inspections are increased to at least 196 farms per year to reach our goal.

If you have any questions, please contact me at (209) 525-6753.

Sincerely,



JIM M. SIMPSON, MANAGER  
HAZARDOUS MATERIALS DIVISION

Attachments

# Cupa Inspection Summary

District 1

Dates 7/1/2004

To 6/30/2005

Program	# of Facilities	# of Inspections
AGT	119	0
Business Plan	507	156
Business Plan Farms	77	2
Cal Arp	13	0
Generato	400	79
Medical Waste	49	11
Tiered Permitting	6	3
Active USTs	40	36

# Cupa Inspection Summary

District 2

Dates 7/1/2004 To 6/30/2005

Program	# of Facilities	# of Inspections
AGT	102	0
Business Plan	521	219
Business Plan Farms	252	87
Cal Arp	5	1
Generato	183	69
Medical Waste	12	1
Tiered Permitting	1	0
Active USTs	16	18

# Cupa Inspection Summary

District 3

Dates 7/1/2004 To 6/30/2005

Program	# of Facilities	# of Inspections
AGT	93	0
Business Plan	412	143
Business Plan Farms	83	5
Cal Arp	25	5
Generato	283	62
Medical Waste	18	1
Tiered Permitting	6	0
Active USTs	23	19



# Cupa Inspection Summary

District 4

Dates 7/1/2004 To 6/30/2005

Program	# of Facilities	# of Inspections
AGT	101	0
Business Plan	398	104
Business Plan Farms	177	11
Cal Arp	13	2
Generato	163	46
Medical Waste	22	8
Tiered Permitting	0	0
Active USTs	13	12

# Cupa Inspection Summary

District 7

Dates 7/1/2004 To 6/30/2005

Program	# of Facilities	# of Inspections
AGT	2	0
Business Plan	131	88
Business Plan Farms	0	0
Cal Arp	0	0
Generato	127	11
Medical Waste	0	0
Tiered Permitting	0	0
Active USTs	126	103

# Complaint

## 27 for Div HM

**Complaint** 27 ☐ 2 Assist  
**Date Rec'd** 3/14/2005 **Time Recd** 09:35 AM  
**Received B** spotter **Status** Referred  
**District** **Assigned To** LAM **Type**  
**Referred By**  
**Address** 513 CROWS LANDING MODESTO  
**Cross Street** 7TH **Site Desc** POSSIBLY 531 CROWS LANDING

### Complaint

AUTO WRECKER DRAINING OIL ONTO THE EAST SIDE OF CROWS LANDING, THEY ARE ON THE WEST SIDE OF CROWS LANDING. THIS WAS SEEN BY BRYAN ENGLAND AT PUBLIC WORKS WHO CALLED HIS OFFICE TO CALL US

<b>Prop Owner</b>	<b>Owner Phone</b>
<b>Address</b>	

<b>Complainant</b> SHERRY, PUB WORKS	<b>Phone</b> 525-4130
<b>Address</b>	
<b>Keep Confidential</b> No	

### Other complaints at this address

<i>Complaint #</i>	<i>Date Received</i>	<i>Division</i>	<i>Assigned To</i>	<i>Status</i>
3061	9/24/2003	CE	Frank Alvarez	C

### Action Taken

3/14/05 ONSITE VERIFICATION OF COMPLAINT. ACTUAL LOCATION OF COMPLAINT IS LOCATED ON THE EAST SIDE OF 520 CROWSLANDING ROAD. MET WITH THE OWNER OF MODESTO AUTO WRECKERS, GEORGE SILER. NOTED CARS BEING CRUSHED NEXT TO RAILROAD BY FORREST SILVA CRUSHING. I NOTED A TARP UNDERNEATH THE CRUSHER TO CONTAIN THE WASTE OIL RUN OFF FROM THE VEHICLES. THERE SOME SOIL STAINING FROM THE WASTE OIL. THERE WAS AN AREA OF APPROXIMATELY 10 BY 20 FEET OF OIL STAINING. MR. SILVA OF FOREST SILVA CRUSHING (HUGHSON, CA 209-604-6841) STATES THAT THE CONTAMINATED SOIL WILL PICKED UP AND PLACED IN 55 GALLON CONTAINERS AND STORED AT MODESTO AUTO WRECKERS FOR DISPOSAL AS HAZARDOUS WASTE. I SPOKE TO MR. SILER (MODESTO AUTO WRECKERS, 520 CROWSLANDING ROAD, MODESTO CA 95351) REGARDING THE CAR CRUSHING ACTIVITY NEXT TO THE RAILROAD PROPERTY. HE STATED THAT HE HAD PERMISSION FROM "SANTA FE RAILROAD". THE PROPERTY IS OWNED BY UNION PACIFIC RAILROAD. I CONTACTED BRAIN CHAVES FROM UNION PACIFIC REGARDING THE ACTIVITY THERE. MR. CHAVES STATED THAT MODESTO AUTO WRECKERS DOES NOT HAVE PERMISSION TO CRUSH VEHICLES ON THEIR PROPERTY. I ALSO NOTED A MOBILE HOME NEXT TO THE CRUSHED VEHICLES REFERRED CASE CODE ENFORCEMENT. 3/15/05 FOLLOW UP. ONSITE VERIFICATION OF THE CLEAN UP FROM THE CRUSHING ACTIVITY. THE AREA OF OIL SPILL HAS BEEN CLEANED AND THE HAZARDOUS WASTE WAS CONSOLIDATED AT MODESTO AUTO WRECKERS FOR PICK UP.